

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, <i>et al</i> ,	§	
	§	
Plaintiffs,	§	
VS.	§	CIVIL ACTION NO. 2:13-CV-00193
	§	
RICK PERRY, <i>et al</i> ,	§	
	§	
Defendants.	§	

**NOTICE OF FILING OF PLAINTIFFS' AND DEFENDANTS' ADDITIONAL
DEPOSITION DESIGNATIONS**

On August 29, 2014, Plaintiffs and Defendants filed certain page and line deposition designations with the Court. (See Plaintiffs' Notice of Deposition Designations (ECF No. 539) and Defendants' Notice of Deposition Designations (ECF No. 541)). Since that time, Plaintiffs and Defendants have completed additional deposition designations, including designations from (1) depositions and trial testimony from *Texas v. Holder*; (2) the depositions of Michelle Slusher and Debra Frary, the Department of Justice's designees for the 30(b)(6) deposition that occurred on August 26, 2014; (3) the deposition of Senator Robert Duncan, whose deposition was taken on August 28, 2014; (4) the continuation of Plaintiff Lenard Taylor's deposition, which occurred on September 3, 2014; (5) the deposition of Jeffrey Milyo; and (6) the deposition of Chandler Davidson.

The Plaintiffs have provided Defendants with a complete list of their Affirmative Deposition Designations, which has been updated since August 29, 2014, and is attached hereto as Exhibit 1 (which does not include the deposition

designations from Lenard Taylor's continued deposition or the 30(b)(6) deposition of the United States, but includes designations from Senator Robert Duncan and Jeffrey Milyo's depositions). Attached as Exhibit 2 is a chart which reflects the page-line designations from both parties from Mr. Taylor's continued deposition. Attached as Exhibit 3 is a chart which includes Defendants' Affirmative Designations from the August 28, 2014 deposition of Senator Robert Duncan. Attached as Exhibit 4 is a chart which includes Defendants' Affirmative Designations from the deposition of Chandler Davidson. Attached as Exhibit 5 are (a) Defendants' Deposition Designations for the United States' 30(b)(6) witnesses; (b) the United States' Counter-Designations to those designations; (c) an e-mail dated September 17, 2014 reflecting edits to those Counter-Designations; and (d) Defendants' responses to the United States' Counter-Designations. Attached as Exhibit 6 are Defendants' Affirmative Designations, and Plaintiffs' Counter-Designations, of trial and deposition testimony in *Texas v. Holder*, which, includes, for completeness, both designations submitted on August 29, 2014, and designations completed after that date by agreement of the parties. Attached as Exhibit 7 are Plaintiffs' Affirmative Designations, and Defendants' Counter-Designations, of trial and deposition testimony in *Texas v. Holder*, which includes, for completeness, both designations filed by Plaintiffs and Defendants on August 29, 2014, and designations completed after that date by agreement of the parties.

Defendants will be sending all highlighted deposition transcripts containing all deposition designations, via Federal Express, on behalf of both parties, to arrive on September 19, 2014.

Dated: September 18, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2014, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ John B. Scott
JOHN B. SCOTT